5-dr-00203-ES Document 19 Filed 04/28/15 Page 1 of 5 PageID: 162

APR 2 8 2015

WILLIAM T. WALSH, CLERK

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

Hon. Jose L. Linares

v.

Crim. No. 15 - 203

LATEEF GRIMSLEY.

21 U.S.C. § 846

RASSOL CHINA,

21 U.S.C. § 841(a)(1) and (b)(1)(A)

DAQUWANN WALKER,

18 U.S.C. § 2

BRYANT RUDD, and

SHAKUR BILLINGHURST

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT ONE

(Conspiracy to Distribute a Controlled Substance)

On or about November 12, 2013, in Essex County, in the District of New Jersey and elsewhere, the defendants.

> LATEEF GRIMSLEY, RASSOL CHINA, DAQUWANN WALKER, BRYANT RUDD, and SHAKUR BILLINGHURST,

did knowingly and intentionally conspire and agree with each other and others to distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT TWO (Distribution of a Controlled Substance)

On or about November 12, 2013, in Essex County, in the District of New Jersey and elsewhere, the defendants,

LATEEF GRIMSLEY, RASSOL CHINA, DAQUWANN WALKER, BRYANT RUDD, and SHAKUR BILLINGHURST,

did knowingly and intentionally distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18 United States Code, Section 2.

FORFEITURE ALLEGATION

- 1. The allegations set forth in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.
- 2. Pursuant to Title 21, United States Code, Section 853, upon conviction of violating Title 21, United States Code, Sections 841 and 846, as charged in Counts One and Two, the defendants,

LATEEF GRIMSLEY,
RASSOL CHINA,
DAQUWANN WALKER,
BRYANT RUDD, and
SHAKUR BILLINGHURST,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violations.

- 3. If any of the property described above, as a result of any act or omission of the defendants:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred of sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL

PAUL J. FISHMAN

United States Attorney

CASE NUMBER: 15- 303 (TLL

United States District Court District of New Jersey

UNITED STATES OF AMERICA

Þ.

LATEEF GRIMSLEY,
RASSOL CHINA,
DAQUWANN WALKER,
BRYANT RUDD, and
SHAKUR BILLINGHURST

INDICTMENT FOR

21 U.S.C. § 846 21 U.S.C. §§ 841(a)(1) and (b)(1)(A) 18 U.S.C. § 2

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

AT 8:30 M WILLIAM T. WALSH, CLERK BARRY A. KAMAR ASSISTANT U.S. ATTORNEY 973-645-2906